Before the FEDERAL COMMUINCATIONS COMMISSION

DA 25-219 Released: March 12, 2025
RE: DELETE, DELETE, DELETE
GN Docket No. 25-133

Comments Due: Friday, April 11, 2025

SUMMARY:

With this filing, Turbo Technical Services ("TTS") makes comment in the above noted proceeding, requesting Commission consideration of deletion or modification of specific Rules and Regulations as outlined in the Public Notice. TTS has been involved in FCC application and licensing process since 1981 and has filed thousands of applications for hundreds of clients for AM, FM and FM translator stations and modifications. Their extensive experience with FCC processes gives them a unique and real-world view of the impact of Commission Rules and Regulations.

COMMENT:

TTS requests modification of Section 74.1233(D)(2)(i) to permit New FM translator applications outside of a designated filing window, under certain circumstances. That sections states *"The FCC will specify by Public Notice, pursuant to § 73.5002(a) of this chapter, a period for filing non-reserved band FM translator applications for a new station or for major modifications in the facilities of an authorized station.*" This has happened several times in the past 20+ years, with noted success in creation of new FM translator stations. Because of the status of the FM dial in the Top 200+ markets, there are no available channels to facilitate a possible National filing window, ever again in the future. That is not true in the rural areas, where open translator channels are abundant with no mechanism to request one.

TTS proposes that the language be of such in the Rules that NEW FM translator applications can be made at any time outside a ranked market, providing the application is not for the only available channel; a showing of such would be required. This would permit AM stations which have no FM companion, as well as new HD fill-in and other FM translators in rural areas to be created.

A thorough review of this is hereby encouraged.

Respectfully Submitted

Jim Turvaville, Owner
Turbo Technical Services